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May 11, 2017

VIA ECF

The Honorable James L. Cott
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Thomas Chung v. Highgate Hotels, L.P. et al., 16-CV-3069 (AT-JLC)

Dear Judge Cott:

We represent Defendants Highgate Hotels, L.P., Vornado Realty Trust, and Vincent Curcio ("Defendants") in the above-referenced matter. On behalf of all parties, and in accordance with Rule I.E of Your Honor's Individual Practices, we respectfully write to update the Court on the status of discovery in this matter, and to request an extension of the fact discovery deadline from May 17, 2017 until June 17, 2017.

Since the Court granted the parties' initial request to extend the fact discovery deadline (Docket No. 45), the parties have continued to work to secure the production of Plaintiff's medical records. As those records bear significantly on Plaintiff's claims, the parties had planned on completing depositions after the production of those records. While the parties are still awaiting the delivery of that production from Plaintiff's medical providers, we expect to receive it shortly. In anticipation of that production, the parties are working to schedule the 4 depositions they plan to complete in this case. In light of the foregoing, the parties respectfully request an extension of the fact discovery deadline up to and including June 17, 2017. This is the parties' second request for an extension of the fact discovery deadline. Barring any unforeseen issues, the parties expect that this extension will afford them sufficient time to complete fact discovery.

Thank you for Your Honor's consideration of this request.

The Honorable James L. Cott
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Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "Evan B. Citron", written in a cursive style.

Evan B. Citron

cc: Owen H. Laird, Esq.